

JTW: 01.22.24  
CJF: USAO:2022R00056

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

SHERMAN THOMAS,

Defendant

CRIMINAL NO.

*JRR 24 cr 25*  
(Possession of a Firearm and  
Ammunition by a Prohibited Person,  
18 U.S.C. § 922(g)(1); Possession with  
the Intent to Distribute Controlled  
Substances, 21 U.S.C. § 841;  
Possession of a Firearm in  
Furtherance of a Drug Trafficking  
Crime, 18 U.S.C. § 924(c); Forfeiture,  
18 U.S.C. § 924(d), 21 U.S.C. § 853,  
and 28 U.S.C. § 2461(c))

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INDICTMENT

COUNT ONE

The Grand Jury for the District of Maryland charges that:

On or about October 26, 2023, in the District of Maryland, the defendant,

**SHERMAN THOMAS,**

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm and ammunition, to wit: a Taurus, .380 caliber, semi-automatic pistol, with serial number D116441, loaded with 6 rounds of .380 caliber ammunition; and 45 rounds of 9mm ammunition; and the firearm and ammunition were in and affecting commerce.

18 U.S.C. § 922(g)

**COUNT TWO**

The Grand Jury for the District of Maryland further charges that:

On or about October 26, 2023, in the District of Maryland, the defendant

**SHERMAN THOMAS,**

did knowingly and intentionally possess with the intent to distribute: a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance; a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance; a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance; and a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a).

21 U.S.C. § 841

**COUNT THREE**

The Grand Jury for the District of Maryland further charges that:

On or about October 26, 2023, in the District of Maryland, the defendant,

**SHERMAN THOMAS,**

did knowingly possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with the intent to distribute heroin, cocaine, methamphetamine, and fentanyl, as charged in Count Two of this Indictment, which is incorporated by reference herein.

18 U.S.C. § 924(c)(1)(A)

**FORFEITURE ALLEGATION**

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 924(d), 21 U.S.C. § 853, and 28 U.S.C. § 2461(c), in the event of the defendant's convictions under Counts One through Three of this Indictment.

**Narcotics Forfeiture**

2. Upon conviction of the offense alleged in Count Two, the defendant,

**SHERMAN THOMAS,**

shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a):

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense; and
- b. any property used or intended to be used, in any manner or part, to commit, or facilitate the commission of, such offense.

**Firearms and Ammunition Forfeiture**

3. Upon conviction of either of the offense(s) alleged in Counts One or Three of this Indictment, the defendant,

**SHERMAN THOMAS,**

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in such offense(s).

**Property Subject to Forfeiture**

4. The property to be forfeited includes, but is not limited to:

- a. a Taurus, .380 caliber, semi-automatic pistol, with serial number D116441;

- b. a Polymer80, 9mm semi-automatic pistol bearing no serial number;
- c. approximately six rounds of .380 caliber ammunition;
- d. approximately 45 rounds of 9mm ammunition; and
- e. approximately \$3,824 in U.S. currency seized from 4107 Orchard Ridge Boulevard, Baltimore, Maryland.

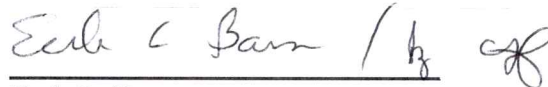
**Substitute Assets**

5. If, as a result of any act or omission of the defendant, any of the property described above as being subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty,

the United States shall be entitled to forfeiture of substitute property up to the value of the forfeitable property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

18 U.S.C. § 924(d)  
21 U.S.C. § 853  
28 U.S.C. § 2461(c)



Erik L. Barron  
United States Attorney

A TRUE BILL: 

**SIGNATURE REDACTED**

Foreperson 

1/30/24  
Date